

NONPARTY LNRS' OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL

EXHIBIT 1

From: Farley, Will
Sent: Thursday, December 7, 2023 12:55 PM
To: Schwahn, Derek M.
Subject: Fwd: RE: Nelson L. Bruce v. Rev Federal Credit Union, Trans Union, et al.; Case No. 2:22-cv-01292

Will Farley

troutman pepper

Direct: 704.998.4099 | Mobile: 704.678.1113 | Internal: 22-4099
will.farley@troutman.com

----- Forwarded message -----

From: Leon <leonbruce81@yahoo.com>
Date: December 7, 2023 at 11:05:51 AM EST
Subject: RE: Nelson L. Bruce v. Rev Federal Credit Union, Trans Union, et al.; Case No. 2:22-cv-01292
To: Farley, Will <Will.Farley@troutman.com>, Haggerty, Meredith <Meredith.Haggerty@troutman.com>

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Will,

I would need a statement signed under penalty of perjury attesting to what you have disclosed by a person with firsthand personal knowledge otherwise I would have to assume that this is an untrue statement and I will have to move forward with court assistance for compliance. I need a copy of this statement emailed to me by 4:00 p.m. EST today and mailed to me as well. Thanks!

Nelson L. Bruce

On Thu, Dec 7, 2023 at 10:16 AM, Farley, Will
<Will.Farley@troutman.com> wrote:

Mr. Bruce:

LexisNexis Risk Solutions Inc. has produced the documents in its possession responsive to your subpoena. LNRS has searched its records and has not identified records responsive to Requests 4, 5, 6,

or 9 because LNRS did not supply your bankruptcy record to TransUnion. LNRS has fulfilled its obligations in responding to your subpoena. Thank you.

Will Farley

troutman pepper

Direct: 704.998.4099 | Mobile: 704.678.1113 | Internal: 22-4099

will.farley@troutman.com

From: Leon <leonbruce81@yahoo.com>

Sent: Wednesday, December 6, 2023 11:40 PM

To: Farley, Will <Will.Farley@troutman.com>; Haggerty, Meredith <Meredith.Haggerty@troutman.com>

Subject: Re: Nelson L. Bruce v. Rev Federal Credit Union, Trans Union, et al.; Case No. 2:22-cv-01292

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Will,

As presented in my previous email, request numbers 4, 5, 6 and 9 are not related to any disputes. It requesting any and all document you have in your possession related to Trans Union from June 13, 2017 to present. Specifically, I am looking for any and all agreements you have with Trans Union to use your services, any and all lists of services for which you charge a fee/payment for which you provide to Trans Union, any and all search and match requests by Trans Union including the day, month and year requested related to the plaintiff to match to a bankruptcy, a list of every piece of information required to match a consumer to a bankruptcy, a copy of any and all your policies and procedures related to searching bankruptcies, the exact reports furnished as a result of the search and match services as it relates to searching for a bankruptcy with the plaintiff's identifiable information and the permissible purpose selected by Trans Union when they requested to do a search for a bankruptcy related to the plaintiff by utilizing your services. Please let me know by 12 p.m. EST Thursday November 7, 2023 whether or not LexisNexis will comply with my request for production of documents so I know whether to request for an extension of time as my discovery period is expiring or a motion to compel with the court. Thanks! If you have any questions, I can be reached at the number below.

Nelson "Leon" Bruce

We opted out of any attempt by you to contract by electronic communication unless specifically agreed upon!

Best regards, Leon Bruce

Direct Line: 843-437-7901 Private Correspondence to intended party from: Leon Bruce also known as Nelson

leonbruce81@yahoo.com

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On Tuesday, December 5, 2023 at 07:25:58 PM EST, Leon <leonbruce81@yahoo.com> wrote:

Will,

You have failed to respond produce documents related to requests 4, 5, and 6. LexisNexis website says that they provide information to Trans Union and Trans Union has already admitted that they obtained information from LexisNexis therefore documentation related to LexisNexis and TransUnion must be present. If this is not the case, and LexisNexis does not have any documents available as specified in my definition of documents and has never had documents related to Trans Union, I would need this in writing signed under penalty of perjury.

Nelson L. Bruce

On Tue, Dec 5, 2023 at 6:48 PM, Farley, Will

<Will.Farley@troutman.com> wrote:

Mr. Bruce:

The documents produced were the ones identified as responsive to your subpoena and related to Request No. 8. LexisNexis Risk Solutions Inc. is not in possession of any documents related to your alleged dispute(s) with TransUnion and does not have a record of TransUnion forwarding your alleged dispute to it.

Thanks,

Will Farley

troutman pepper

Direct: 704.998.4099 | Mobile: 704.678.1113 | Internal: 22-4099

will.farley@troutman.com

From: Leon <leonbruce81@yahoo.com>

Sent: Tuesday, December 5, 2023 6:07 PM

To: Haggerty, Meredith <Meredith.Haggerty@troutman.com>

Cc: Farley, Will <Will.Farley@troutman.com>

Subject: Re: Nelson L. Bruce v. Rev Federal Credit Union, Trans Union, et al.; Case No. 2:22-cv-01292

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Meredith,

I reviewed the files you sent me via zip folder. When reviewing these documents and recording, the response does not comply with my subpoena request. What was sent to me is related to my disputes with LexisNexis not disputes or documents and communications with Trans Union related to disputes and investigations forwarded by Trans Union for LexisNexis to investigate as I am sure, LexisNexis has had some communication with Trans Union from between the dates presented in my Subpoena. Further, the documents in the zip folder fail to include a natural persons signatures under penalty of perjury testifying that this is all the documents that LexisNexis has relevant to my requests. Please have LexisNexis respond appropriately. I am moving forward with drafting my notification to the court as it appears that LexisNexis will not cooperate with my Subpoena request. Thanks!

Nelson L. Bruce

We opted out of any attempt by you to contract by electronic communication unless specifically agreed upon!

Best regards, Leon Bruce

Direct Line: 843-437-7901 Private Correspondence to intended party from: Leon Bruce also known as Nelson

leonbruce81@yahoo.com

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On Tuesday, December 5, 2023 at 05:33:49 PM EST, Haggerty, Meredith
<meredith.haggerty@troutman.com> wrote:

Mr. Bruce,

Thank you for returning the signed consent form. Attached is a zip folder of documents responsive to your subpoena to LexisNexis Risk Solutions Inc. Please let us know whether you would also like these documents separately mailed to you. There is a call recording in the production that would need to be transferred to a secure disk if you want to receive physical copies of the documents.

Thank you,

Meredith

Meredith P. Haggerty

Legal Practice Assistant to William J. Farley III, Esq.

troutman pepper

Direct: 704.998.4053 | Mobile: 757.755.5407 | Internal: 22-4053

meredith.haggerty@troutman.com

From: Leon <leonbruce81@yahoo.com>

Sent: Tuesday, December 5, 2023 4:18 PM

To: Haggerty, Meredith <Meredith.Haggerty@troutman.com>

Cc: Farley, Will <Will.Farley@troutman.com>

Subject: Re: Nelson L. Bruce v. Rev Federal Credit Union, Trans Union, et al.; Case No. 2:22-cv-01292

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Meredith,

Please see attached the requested signed consent document.

Nelson "Leon" Bruce

We opted out of any attempt by you to contract by electronic communication unless specifically agreed upon!

Best regards, Leon Bruce

Direct Line: 843-437-7901 Private Correspondence to intended party from: Leon Bruce also known as Nelson

leonbruce81@yahoo.com

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On Tue, Dec 5, 2023 at 2:51 PM, Haggerty, Meredith

<Meredith.Haggerty@troutman.com> wrote:

Mr. Bruce,

LexisNexis Risk Solutions Inc. has identified documents responsive to your subpoena. Before producing those documents, we will need you to sign and return the attached consent form. We can then provide the documents identified.

Thank you,
Meredith

Meredith P. Haggerty

Legal Practice Assistant to William J. Farley III, Esq.

Direct: 704.998.4053 | Mobile: 757.755.5407 | Internal: 22-4053

meredith.haggerty@troutman.com

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301 S College Street, Suite 3400

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